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**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	
MARK A. GONSKY,	:	Chapter 13
	:	Case No.: 5:15-bk-03375
Debtor	:	
	:	

M&T BANK,	:	
	:	
Movant	:	
vs.	:	
	:	
MARK A. GONSKY,	:	
Debtor	:	U.S.C. Section 362
	:	
CHARLES J. DeHART, ESQUIRE	:	
	:	
Trustee	:	

**ANSWER OF DEBTOR TO MOTION OF M&T BANK FOR
RELIEF FROM THE AUTOMATIC STAY**

The Debtor, MARK A. GONSKY, by and through his counsel, David J. Harris, Esquire,
hereby answers the Motion of M&T Bank for relief from the automatic stay as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.

5. ADMITTED.

6. DENIED. Strict proof thereof is demanded for trial. By way of further answer, the Debtor made monthly mortgage payments to Movant throughout the course of his bankruptcy case.

7. DENIED. Strict proof thereof is demanded for trial.

8. DENIED. Strict proof thereof is demanded for trial.

9. DENIED. Strict proof thereof is demanded for trial.

10. DENIED. Strict proof thereof is demanded for trial.

11. DENIED. Strict proof thereof is demanded for trial.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

AFFIRMATIVE DEFENSES

12. Debtor hereby incorporates by reference his answers in Paragraphs 1 through 11 above as if made a part hereof.

13. There is sufficient equity in the subject property.

14. Movant is adequately protected.

15. The subject property is necessary to the Debtor for an effective reorganization.

16. There is no cause for granting the relief sought by Movant in its Motion.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

RESPECTFULLY SUBMITTED

Dated: September 1, 2016
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris
DAVID J. HARRIS, ESQUIRE